

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 13-429 (RBK)  
v. :  
KEITH JACKSON, : 21 U.S.C. § 846  
a/k/a "Tick"

**SUPERSEDING INFORMATION**

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

From in or about January 2012 to in or about April 2013, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

KEITH JACKSON,  
a/k/a "Tick,"

did knowingly and intentionally conspire and agree with others to distribute and to possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I drug controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

**FORFEITURE ALLEGATIONS**

1. The allegations contained in this Superseding Information are hereby realleged and incorporated by reference for the purpose of noticing forfeitures pursuant to Title 21, United States Code, Section 853.

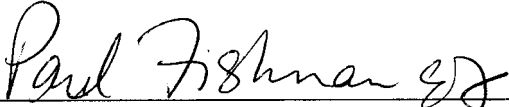
2. The United States hereby gives notice to the defendant charged in this Superseding Information that, upon conviction of the offense charged, the government will seek forfeiture, in accordance with Title 21, United States Code, Section 853(a), of any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the violation of Title 21, United States Code, Section 846, alleged in this Superseding Information, and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violation of Title 21, United States Code, Section 846, alleged in this Superseding Information, including but not limited to the following:

- a) Approximately \$213,695.00 (which includes \$114,870 seized on April 9, 2013 from 367 Morris Street, Apt. 5, Woodbury, New Jersey and \$66,102 seized on April 9, 2013 from 4 Hunter Drive, Camden, New Jersey) in United States currency, in that such sum constitutes and is derived, directly and indirectly, from proceeds traceable to the commission of the conspiracy to distribute and to possess with intent to distribute cocaine, a Schedule II controlled substance, crack cocaine, a Schedule II drug controlled substance, and heroin, a Schedule I drug controlled substance and is intended to be used in any manner and part to commit and to facilitate the commission of said offense.

3. If by any act or omission of the defendant, any of the property subject to forfeiture described in paragraph 2 herein:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided

without difficulty, the United States of America will be entitled to forfeiture of substitute property up to the value of the property described above in paragraph 2, pursuant to Title 21, United States Code, Section 853(p).

  
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PAUL J. FISHMAN  
United States Attorney

**CASE NUMBER: 2012R00697**

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**KEITH JACKSON,  
a/k/a “Tick”**

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**SUPERSEDING  
INFORMATION FOR**

**21 U.S.C. § 846**

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**PAUL J. FISHMAN**  
*U.S. ATTORNEY, NEWARK, NEW JERSEY*

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**ERIN M. FAY**  
*Special Assistant U.S. Attorney  
Camden, New Jersey  
(856) 757-5026*

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